

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA

v.

**MATTHEW NELSON TUNSTALL,
Defendant.**

§
§
§
§
§
§

Case No. 1:21-CR-223-LY

**JOINT MOTION FOR COTINUANCE
OF TRIAL AND RELATED DEADLINES**

The United States of America, through its undersigned counsel, and the defendant, by and through counsel, hereby respectfully move this Court for a continuance of the trial currently scheduled to commence on January 9, 2023, and an extension of the filing deadlines associated.

On August 16, 2022, counsel for the defendant, after conferring with the government, filed an unopposed motion requesting a continuance of the October 3, 2022 trial date and corresponding deadlines to a date in February 2023, which the Court granted on August 22, 2022. (Clerk's Doc. #82) (Order). The Court reset the trial date to January 9, 2023, and scheduled filing deadlines for November 30 and December 21, 2022, respectively. *Id.*

Due to conflicting trial schedules at the end of the calendar year, the parties respectfully request a continuance of the January 9, 2023 trial date to a date in mid-to-late February 2023, to the extent the Court is amenable, as well as an extension of the corresponding filing deadlines so that justice may be done.

Respectfully submitted,

SUMPTER & GONZÁLEZ, L.L.P.
3011 N. Lamar, Ste. 200
Austin, Texas 78705
Telephone: (512) 381-9955
Facsimile: (512) 485-3121

/s/ Worth Carroll

Worth Carroll
State Bar No. 24091192
worth@sg-llp.com
ATTORNEY FOR THE DEFENDANT

COREY R. AMUNDSON
Chief, Public Integrity Section
U.S. Department of Justice

/s/ Michael N. Lang

Michael N. Lang and Celia Choy
Trial Attorneys
Public Integrity Section
U.S. Department of Justice

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorney of record for the defendant.

Dated: August 24, 2022

/s/ Michael N. Lang
Michael N. Lang
Trial Attorney